

Federal Defenders
OF NEW YORK, INC.

MEMO ENDORSED

White Plains, NY 10601

Tel: (914) 428-7124 Fax: (914) 948-5109

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

June 20, 2025

The Honorable Victoria Reznik
Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: *United States v. Kevin Cabrera* (24 MJ 03822)

Dear Honorable Reznik,

I am writing to ask that the Court please modify the terms of Mr. Cabrera's release to allow Mr. Cabrera to work at a warehouse in Brewster, New York. As background, in October, 2024, Mr. Cabrera was charged with 18 USC 2251(a) and (e) in relation to allegations that unlawfully communicated, via a phone, with a child and sought and obtained sexually explicit photographs during these communications. At that time, Mr. Cabrera worked construction. After his presentment, Mr. Cabrera was released pursuant to an unsecured \$100,000 bond that was cosigned by two family members. Under the terms of Mr. Cabrera's release, his location is monitored and Mr. Cabrera is subject to home detention. While employment is typically allowed when someone is subjected to home detention, under the terms of Mr. Cabrera's release he was not permitted to return to his prior employment out of concerns that the job, which involved travelling to various construction sites, could not be adequately monitored by Pretrial Services. As such, Mr. Cabrera was released with the understanding that he may in the future seek permission from the Court to work if such employment could be verified and monitored by Pretrial Services. *See* Bond (ECF # 4).

Mr. Cabrera has been looking for work for many months and it appears that he will soon be offered a job at Ace Endica,¹ a regional food distributor.² The position

¹ Information about Ace Endica is available on the company's website:
<https://www.aceendico.com/>

² Mr. Cabrera has been interviewed and, a few days after the interview, Ace Endica informed Mr. Cabrera that if he passed a drug test, which took place today, he would likely be asked to begin work on or about Wednesday, June 25, 2025.

would be at a warehouse in Brewster, New York, and Mr. Cabrera's role would be as a facilities associate assisting warehouse staff and company mechanics to support the warehouse's daily operation. I have communicated with Pretrial Officer Viosanny Harrison and Officer Harrison informed me that Mr. Cabrera has been compliant with the terms of his release and that Pretrial supports this application. I have communicated with AUSA Marcia Cohen and AUSA Cohen indicated that in light of Pretrial Services' support the Government has no objection to this request.

Sincerely,




Benjamin Gold
Assistant Federal Defender

cc: AUSA Marica Cohen
Pretrial Officer Viosanny Harrison

Defendant's bail modification request is
GRANTED, so that he may work at a
warehouse in Brewster, New York.

SO ORDERED.


Hon. Victoria Reznik, U.S.M.J.
Dated: 6/20/25